## IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

THE SCOTT FETZER COMPANY,	) CASE NO.: 1:19-cv-01296
Plaintiff,	) JUDGE: BENITA Y. PEARSON
vs.	) MAG. JUDGE KATHLEEN B. BURKE
MARCUS QUINN, et al.,	CONSENT MOTION FOR LEAVE TO PLEAD
Defendants.	) <u>1 EE/I D</u>
	) )

Pursuant to Civil Rule 6, Defendants Marcus Quinn, Nathan Ramker, and SunFlora, Inc. (collectively, "Defendants"), through their undersigned counsel and with Plaintiff's consent, respectfully move this Court for an Order granting Defendants a leave to plead for a period of fourteen (14) days, up to and including June 26, 2019, to answer and/or otherwise respond to Plaintiff's Complaint.

Defendants timely removed the case on June 5, 2019, making their deadline to answer June 12, 2019. However, the undersigned counsel were retained by Defendants on approximately June 3, 2019. The undersigned requests an additional fourteen (14) days to investigate the claims and to respond properly to the allegations in Plaintiff's Complaint. This request is not made for the purpose of delay, but rather in the interest of justice.

Therefore, Defendants respectfully request, with Plaintiff's consent, that this Court grant them leave to plead, up to and including **June 26, 2019**, to respond to Plaintiff's Complaint.

Respectfully submitted,

STARK & KNOLL CO., L.P.A.

/s/ Kathleen Hahner

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## **CERTIFICATE OF SERVICE**

I certify that on June 11, 2019, a true and correct copy of the foregoing was filed with the Court used the CM/ECF system, which will send an electronic notice to all counsel of record.

/s/ Kathleen Hahner

One of the Attorneys for Defendants